

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>JODI GILL, as Representative and Next Friend of GLENN OSCAR GILL, a Long Term Care Facility Resident, on his behalf and on behalf of all others Similarly Situated</p> <p>and</p> <p>GREG HUBERT, as Representative and Next Friend of NETHIA KNIGHT, a Long Term Care Facility Resident, on her behalf and on behalf of all others Similarly Situated</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>PENNSYLVANIA DEPARTMENT OF HEALTH and RACHEL LEVINE, M.D. In Her Official Capacity as Secretary of Health of the Commonwealth of Pennsylvania</p> <p style="text-align: center;">Defendants</p>	<p>Hon. Chad Kenney</p> <p>Case No. 20-cv-02038</p> <p><b>MOTION FOR EXPANSION OF PAGE LIMITATIONS</b></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------

Robert L. Sachs, Jr. Esq. (#41355)  
Theresa M. Blanco, Esq. (#77468)  
Shrager & Sachs  
2300 One Commerce Square  
2005 Market Street  
Philadelphia PA 19103  
[rsachs@shragerlaw.com](mailto:rsachs@shragerlaw.com)  
[tblanco@shragerlaw.com](mailto:tblanco@shragerlaw.com)  
(215) 568-7771

Peter D. Giglione, Esq. (#89523)  
Massa, Butler, Giglione  
Three Gateway Center  
Suite 1543  
401 Liberty Avenue  
Pittsburgh, PA 15222  
(412) 338-1800  
[pgiglione@mbp-law.com](mailto:pgiglione@mbp-law.com)  
*Attorneys for Plaintiffs and the Class*

Martin S. Kardon, Esq. (#26759)  
Kanter, Bernstein & Kardon PC  
1617 JFK Boulevard, Suite 1150  
Philadelphia, PA 19103  
215-568-5885  
[kardon@kbklaw.com](mailto:kardon@kbklaw.com)

Robert F. Daley, Esq. (#81992)  
D. Aaron Rihn, Esq.  
Robert Peirce & Associates, P.C.  
707 Grant Street, Suite 125  
Pittsburgh PA 15219  
(412) 281-7229  
[bdaley@peircelaw.com](mailto:bdaley@peircelaw.com)

*Attorneys for Plaintiffs and the Class*

**CERTIFICATION OF COMPLIANCE WITH RULE 7.1**

Pursuant to LR 7.1, Plaintiffs certify that they attempted to confer with counsel for Defendant, Pennsylvania Department of Health via email on June 1, 2020 concerning their position with regard to the expansion of the brief page limitations. Plaintiffs have received no response.

**MOTION TO EXPAND PAGE LIMITATIONS**

Plaintiffs respectfully move the Court for leave to file an oversized memorandum in support of Plaintiff's Motion for Preliminary Injunction. Plaintiffs request leave to file up to 15 additional pages (up to 40 pages in total) in order to fully address the complex arguments in support of Plaintiffs' motion.

Respectfully submitted,

**SHRAGER & SACHS**

BY: /s/ Theresa M. Blanco  
Robert L. Sachs, Jr., Esquire  
Theresa M. Blanco, Esquire  
Co-counsel for Plaintiffs  
*On Behalf of All Co-Counsel*

June 1, 2020